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February 14, 2024

The Honorable Robert M. Levy
United States Magistrate Judge
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY EMAIL

Re: *Abraham v. City of New York et al.*

Your Honor,

I write pursuant to Rule 1.4 of the Local Rules for the Eastern District of New York to move the Court to withdraw Joel Wertheimer and Mara Fleder of Wertheimer LLC as counsel of record for Plaintiff Victor Abraham.

My firm has represented Plaintiff Victor Abraham in this action since April 13, 2023. My firm has conducted substantial discovery in this matter, including multiple depositions, and the review of thousands of pages of discovery.

On February 7, 2024, my firm participated in a settlement conference in this matter with Your Honor. On February 13, 2024, Mr. Abraham informed me that he is terminating me and would like me to move to withdraw as counsel, as he intends to proceed *pro se* in this action and would like me to withdraw as soon as possible so that he may communicate with the *pro se* office.

While my firm would be willing to continue to represent Mr. Abraham, this firm can clearly no longer represent Mr. Abraham given he has informed me of our termination and requested this motion be filed posthaste.

Very truly yours,

Joel Wertheimer

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